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15 Attorneys for Defendants VENETIAN CASINO
16 RESORT, LLC; LAS VEGAS SANDS, LLC, and LAS
17 VEGAS SANDS CORP.

18 **IN THE UNITED STATES DISTRICT COURT**
19 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

20 **JONATHAN BROWNING, INC.,**

21 **Plaintiff,**

22 **v.**

23 **VENETIAN CASINO RESORT, LLC, LAS**
24 **VEGAS SANDS, LLC, LAS VEGAS SANDS**
25 **CORP., and DOES 1 through 100, inclusive,**

26 **Defendant.**

27 **VENETIAN CASINO RESORT, LLC, LAS**
28 **VEGAS SANDS, LLC, LAS VEGAS SANDS**
29 **CORP.,**

30 **Third-Party Plaintiffs,**

31 **v.**

32 **KIRK NIX ASSOCIATES INC. D/B/A KNA**
33 **INTERIOR DESIGNS, a California**
34 **corporation,**

35 **Third-Party Defendant.**

CASE NO.: C 07-3983 JSW

STIPULATION FOR ENTRY OF
REVISED SCHEDULE
AND ORDER THEREON

Pursuant to Local Rule 6-2(a), defendants VENETIAN CASINO RESORT, LLC, LAS VEGAS SANDS, LLC, and LAS VEGAS SANDS CORP. (collectively "Defendants") and plaintiff JONATHAN BROWNING, INC. ("Plaintiff"), hereby stipulate to and request the Court enter the proposed Revised Schedule as set forth herein.

IT IS HEREBY STIPULATED, by the parties hereto, through their respective counsel, that both Defendant and Plaintiff agree to a three-month extension of time for the deadlines listed herein. The current deadlines for this case are as follows:

Completion of Fact Discovery and Expert Disclosure:	November 28, 2008
Rebuttal Expert Disclosure:	December 12, 2008
Completion of All Expert Discovery:	January 9, 2009
Hearing on Dispositive Motions:	February 13, 2009
Pre-Trial Conference:	April 27, 2009
Trial:	May 18, 2009

These dates have previously be extended once by the mutual agreement of the parties and the approval of this Court. Good cause to extend these dates can be found on several grounds. Defendants have engaged in substantial electronic discovery efforts. The extraction and review of electronic data has taken significantly longer than originally anticipated. While Defendants' efforts are ongoing, this electronic discovery is still not complete. Additionally, it has recently become clear that it is necessary for Plaintiff also to produce electronic discovery. Plaintiff is in the process of engaging in such discovery, but has not yet produced any electronic discovery. Further, certain persons employed by Defendants have been and continue to be in Asia on business which has made it difficult or impossible to schedule their depositions until after the discovery cut off.

Thus, the parties hereby stipulate to and request that the Court approve and enter the following Revised Schedule:

Completion of Fact Discovery and Expert Disclosure:	February 27, 2009
Rebuttal Expert Disclosure:	March 13, 2009
Completion of All Expert Discovery:	April 10, 2009
Hearing on Dispositive Motions:	May 13, 2009 May 29, 2009 at 9:00 a.m.

1 Pre-Trial Conference:

August 3, 2009 at 2:00 p.m.

~~July 28, 2009~~

2 Trial:

~~August 17, 2009~~

3 SO STIPULATED.

August 24, 2009 at 8:00 a.m.

5 Dated: November 5, 2008

DUANE MORRIS LLP

7 By: s/ Michelle A. Hon

Ray L. Wong

Michelle Hon

Attorneys for Third-Party Plaintiffs VENETIAN
CASINO RESORT, LLC, LAS VEGAS SANDS, LLC,
and LAS VEGAS SANDS CORP.

10 Dated: November 5, 2008

McNamer and Company

12 By: s/Anthony McNamer

Anthony McNamer

Attorneys for Plaintiff

JONATHAN BROWNING INC.

15 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

17 Dated: November 6, 2008

18 By:


Hon. Jeffrey S. White
District Court Judge